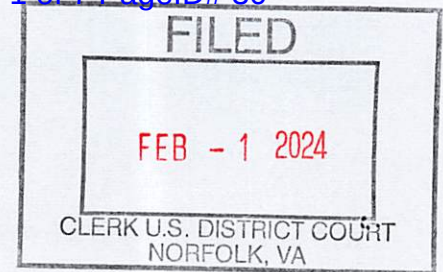


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Newport News Division



UNITED STATES OF AMERICA)	Criminal No. 4:24-mj-3
)	
v.)	18 U.S.C. § 795
)	Unlawful Photographing of Designated
FENGYUN SHI,)	Installation Without Authorization
)	(Counts 1, 2, & 3)
Defendant.)	
)	18 U.S.C. § 796
)	Use of Aircraft for the Unlawful
)	Photographing of Designated Installation
)	Without Authorization
)	(Counts 4, 5, & 6)

Superseding CRIMINAL INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT ONE

(Unlawful Photographing of Designated Installation Without Authorization)

On or about January 5, 2024, in the Eastern District of Virginia, the defendant, FENGYUN SHI, knowingly photographed naval installations and equipment which are classified, designated, and marked with the approval and at the direction of the President and located within any commercial establishment engaged in the development and manufacture of classified military and naval arms, munitions, equipment, designs, ships, aircraft, and vessels for the United States Army, Navy, and Air Force, pursuant to Executive Order No. 10104, without authorization, to wit: a photo image file entitled, "DJI_0009.JPG", depicting a United States Navy vessel and equipment located within BAE Systems Shipbuilding in Norfolk, Virginia, a United States Department of Defense Cleared Defense Contractor.

(In violation of Title 18, United States Code, Section 795).

COUNT TWO

(Unlawful Photographing of Designated Installation Without Authorization)

On or about January 5, 2024, in the Eastern District of Virginia, the defendant, FENGYUN SHI, knowingly photographed naval installations and equipment which are classified, designated, and marked with the approval and at the direction of the President and located within any commercial establishment engaged in the development and manufacture of classified military and naval arms, munitions, equipment, designs, ships, aircraft, and vessels for the United States Army, Navy, and Air Force, pursuant to Executive Order No. 10104, without authorization, to wit: a photo image file entitled, "DJI_00012.JPG", depicting a United States Navy vessel and equipment located within General Dynamics National Steel and Shipbuilding Company – Norfolk, in Norfolk, Virginia, a United States Department of Defense Cleared Defense Contractor.

(In violation of Title 18, United States Code, Section 795).

COUNT THREE

(Unlawful Photographing of Designated Installation Without Authorization)

On or about January 5, 2024, in the Eastern District of Virginia, the defendant, FENGYUN SHI, knowingly photographed naval installations and equipment which are classified, designated, and marked with the approval and at the direction of the President and located within any commercial establishment engaged in the development and manufacture of classified military and naval arms, munitions, equipment, designs, ships, aircraft, and vessels for the United States Army, Navy, and Air Force, pursuant to Executive Order No. 10104, without authorization, to wit: a photo image file entitled, "DJI_0002.JPG", depicting United States Navy vessels and equipment located within BAE Systems Shipbuilding in Norfolk, Virginia, a United States Department of Defense Cleared Defense Contractor and within General Dynamics National Steel and Shipbuilding Company – Norfolk, in Norfolk, Virginia, a United States Department of Defense Cleared Defense Contractor.

(In violation of Title 18, United States Code, Section 795).

COUNT FOUR

**(Use of Aircraft for the Unlawful Photographing of Designated Installation
Without Authorization)**

On or about January 5, 2024, in the Eastern District of Virginia, the defendant, FENGYUN SHI, used an unmanned aircraft to knowingly photograph naval installations and equipment which are classified, designated, and marked with the approval and at the direction of the President and located within any commercial establishment engaged in the development and manufacture of classified military and naval arms, munitions, equipment, designs, ships, aircraft, and vessels for the United States Army, Navy, and Air Force, pursuant to Executive Order No. 10104, without authorization, to wit: a photo image file entitled, "DJI_0002.JPG", depicting United States Navy vessels and equipment located within BAE Systems Shipbuilding in Norfolk, Virginia, a United States Department of Defense Cleared Defense Contractor and within General Dynamics National Steel and Shipbuilding Company – Norfolk, in Norfolk, Virginia, a United States Department of Defense Cleared Defense Contractor.

(In violation of Title 18, United States Code, Section 796).

COUNT FIVE

(Use of Aircraft for the Unlawful Photographing of Designated Installation
Without Authorization)

On or about January 6, 2024, in the Eastern District of Virginia, the defendant, FENGYUN SHI, used an unmanned aircraft to knowingly photograph naval installations and equipment which are classified, designated, and marked with the approval and at the direction of the President and located within any commercial establishment engaged in the development and manufacture of classified military and naval arms, munitions, equipment, designs, ships, aircraft, and vessels for the United States Army, Navy, and Air Force, pursuant to Executive Order No. 10104, without authorization, to wit: a photo image file entitled, "DJI_00023.JPG", depicting a United States Navy vessel and equipment located within Newport News Shipbuilding in Newport News, Virginia, a subsidiary of Huntington Ingalls Industries, a United States Department of Defense Cleared Defense Contractor.

(In violation of Title 18, United States Code, Section 796).

COUNT SIX

**(Use of Aircraft for the Unlawful Photographing of Designated Installation
Without Authorization)**

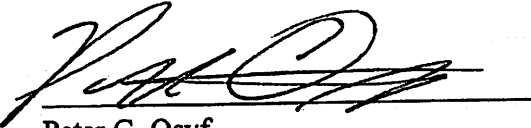
On or about January 6, 2024, in the Eastern District of Virginia, the defendant, FENGYUN SHI, used an unmanned aircraft to knowingly photograph naval installations and equipment which are classified, designated, and marked with the approval and at the direction of the President and located within any commercial establishment engaged in the development and manufacture of classified military and naval arms, munitions, equipment, designs, ships, aircraft, and vessels for the United States Army, Navy, and Air Force, pursuant to Executive Order No. 10104, without authorization, to wit: a photo image file entitled, "DJI_0026.JPG_embedded_2_partial.jpg", depicting a United States Navy vessel and equipment located within Newport News Shipbuilding in Newport News, Virginia, a subsidiary of Huntington Ingalls Industries, a United States Department of Defense Cleared Defense Contractor.

(In violation of Title 18, United States Code, Section 796).

United States v. Fengyun Shi
Criminal No. 4:24-mj-3

JESSICA D. ABER
UNITED STATES ATTORNEY

By: _____



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